

Federal Defenders OF NEW YORK, INC.

Southern District
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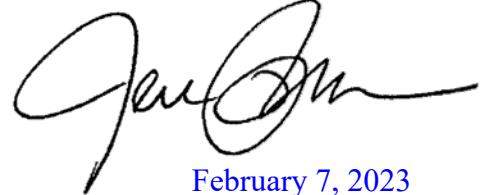
Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

February 6, 2023

By ECF

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Centre Street
New York, NY 10007

Application GRANTED. The Clerk of Court is
directed to terminate Doc. #139. SO ORDERED.



February 7, 2023

Re: United States v. Abdul Mumuni,
21 Cr. 523 (JMF)

Dear Judge Furman:

I write to respectfully request a modification of Abdul Mumuni's bail conditions, specifically that the Court remove his location monitoring requirement. I have conferred with Pre-Trial Services Officer Christina Venable, who consents to this application, and the Government, by AUSA Kevin Mead, who takes no position.

Since the Court imposed location monitoring on Mr. Mumuni approximately one year ago in light of his being charged with operating a motor vehicle without a license, Mr. Mumuni has scrupulously adhered to the terms of his release conditions and complied with all location monitoring requirements, and the Bronx County charges have been dismissed (as of May 31, 2022). These circumstances, along with Pre-Trial Services' acknowledgement that location monitoring is no longer necessary, support the Court's removal of this condition from the terms of Mr. Mumuni's bail.

I thank the Court for its consideration of this application.

Respectfully Submitted,



Andrew John Dalack, Esq.
Assistant Federal Defender
Tel: (646) 315-1527

cc: AUSA Jane Chong
AUSA Kevin Mead
Officer Christina Venable